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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 10, 1993

Ms. Donna Searcy
Office of the Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

Dear Ms. Searcy:

RE: ET Docket 92-9

Pursuant to a request for leave to file additional comments in the above referenced proceeding which was filed with the Commission on February 8, 1993, the Satellite Broadcasting and Communications Association (SBCA) respectfully submits the following. SBCA is the national trade organization representing all segments of the satellite television industry.

As detailed in our earlier submissions to the Commission on the matter of the relocation of 2 GHz Fixed Service operations into the 3.7 - 4.2 GHz band, the satellite television industry is seriously concerned over the impact such an action could have on Fixed Satellite Service operations. This band, as noted earlier, is heavily utilized for satellite links to cable headends, broadcast radio and television stations, SMATV installations, wireless cable headends, and several million unlicensed (and thus unprotected) Home Satellite Dish (HSD) installations.

We have reviewed the revised 4 GHz channelization plan submitted in reply comments by Alcatel Network Systems, Inc. It is clear that Alcatel has expended great resources in an attempt to develop a compatible plan for sharing the 4 GHz allocation between the FS and the FSS. Given the present circumstances however, we can not support Alcatel's proposal to reaccommodate displaced 2 GHz operators in the 4 GHz band.

Our opposition to the Alcatel proposal is based on the fact that sharing the 4 GHz band with the Fixed Service is today difficult at best. The proposal would introduce more microwave transmission paths into an already crowded environment and thus expose more Fixed Satellite Service antennas to interference. This problem would be most acute for the millions of HSD owners who, because of their unlicensed status, have no recourse under current FCC rules to seek protection.

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In addition, the satellite industry remains concerned over the impact Fixed Service interference may have on the transmission of digital video. While it is true that, Alcatel after extensive study, has proposed a scheme which would maintain the existing 10 MHz "off-set" between FS and FSS channels in the current analog environment, such an "off-set" would not exist under a digital format. Thus, interference will be a significant issue due to the fact that microwave interference filters are not useable with digital satellite transmissions. The proposal would lead to the addition of several interfering narrowband FS carriers which would pose a challenge to digital satellite reception. SBCA simply cannot support any plan which would lead to the addition of more interfering FS carriers, the result of which could be the loss of digital satellite reception by HSD owners.

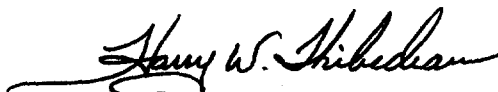
Our concerns lie not so much with the plan that Alcatel has so diligently developed, but with the further overcrowding which would result from relocating up to 23,000 new microwave links into the 4 GHz band -- a move which would have serious impact on the ability of the FSS industry to operate. Thus, we urge the Commission to remove once and for all the 3.7 - 4.2 GHz band from further consideration as a reaccommodation band.

As a matter of equity, we support the well-reasoned Alcatel request for consideration of the 3.6 - 3.7 GHz band as a possible reaccommodation band. The allocation is currently used for international FSS downlinks. Provided these licensed installations are afforded traditional interference protection, their operations should not be impacted. We would be pleased to discuss further with the Commission the matter of 3.6 - 3.7 GHz reaccommodation and would be happy to assist Alcatel in preparing a formal request for reaccommodation.

Sincerely,



Andrew R. Paul
Senior Vice President



Harry W. Thibedeau
Manager of Industry and
Technical Affairs